

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

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SOUTHERN DISTRICT COURT  
WEST DIV CINCINNATI

ELMER CAMPBELL, et al.,

Plaintiffs,

v.

INTERNATIONAL PAPER,  
SUN CAPITAL PARTNERS, INC.  
SMART PAPERS

Defendants.

Case No. C-1-01-527  
J. Beckwith; Mag J. Hogan

**NOTICE OF FILING EXHIBIT 59  
IN SUPPORT OF PLAINTIFFS'  
MEMORANDUM IN OPPOSITION  
TO DEFENDANT SMART PAPERS  
MOTION FOR SUMMARY  
JUDGMENT UNDER SEAL**

The Plaintiffs hereby give notice of filing Exhibit Number 59 in Support of Plaintiffs' Memorandum in Opposition to Defendant Smart Papers Motion for Summary Judgment under seal pursuant to the Protective Order filed with the court on March 4, 2003. This exhibit was inadvertently omitted from the set filed manually with this Court on October 31, 2003.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served via regular U.S. mail on the following individuals this 6<sup>th</sup> day of November, 2003:

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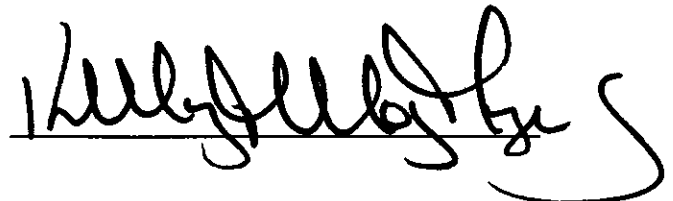
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A handwritten signature in black ink, appearing to read "Michael A. Roberts", written over a horizontal line.